

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. 99-118

ATTORNEY GENERAL'S SECOND SET OF
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's Second Set of Information Requests in the above captioned docket.

AG-2-1 With reference to AG-1-12, the response should provide all supporting, workpapers, calculations, and other documentation regarding the calculations of the return on average common equity for each of the periods indicated.

AG-2-2 For each month December 1998 until the most recent month available, please provide the monthly balance sheet for the Company.

AG-2-3 Referring to Information Request AG-2-2, to the extent that assets or liabilities are attributable to the electric division, please identify such assets or liabilities, and provide the balance for each month.

AG-2-4 With reference to AG-1-60, please provide the storm damage cost incurred each year 1991-1998.

AG-2-5 Referring to the 1999 FERC Form 1, Page 115, Column (e), Lines 14 -17, please provide the supporting calculations for current and deferred income taxes. The response

should start with pre-tax operating income, show the deductions for interest and other tax reconciling items, and show the calculation of current and deferred state and federal income tax expense.

AG-2-6 Please provide the following balances as of December 31, 1998, 1999, and 2000, along with all supporting workpapers, calculations, and documentation:

- a. Electric distribution plant in service.
- b. Accumulated provision for depreciation and amortization of electric distribution plant in service.
- c. Accumulated deferred federal income taxes related to electric distribution operations.
- d. Accumulated deferred state income taxes related to electric distribution operations
- e. Unamortized Pre-1971 Investment Tax Credits
- f. Electric Distribution materials and supplies.
- g. Electric Customer deposits
- h. Electric Customer Advances
- I. Electric Unclaimed Funds
- j. Cash working capital attributable to electric distribution operations, with an explanation of how this item was developed.
- k. Any other items that the Company believes that it would be appropriate to include in or deduct from its electric distribution rate base, with a brief explanation.

AG-2-7 Please provide the month end balances of Electric Distribution Construction Work In Progress for each of the months of 1998 through 2000

AG-2-8 Please provide the following amounts for 1999 and 2000, along with all supporting workpapers, calculations, and documentation:

- a. Distribution revenue generated by the Company's unbundled distribution rates, including any miscellaneous revenue. The revenue should be broken out by customer class and miscellaneous revenue should be itemized.
- b. Distribution operation and maintenance expense. These expenses should be provided by FERC account. To the extent that any expenses are allocated to distribution operations, such as administrative and general expenses, the method of allocation should be described, and all supporting workpapers, calculations, formulas, and assumptions should be provided.
- c. Depreciation and amortization of distribution plant.
- d. Taxes other than income taxes attributable to distribution operations. The response should itemize each tax and should show the method of attribution to distribution operations.
- e. State and federal income taxes attributable to distribution operations. The response should start with pre-tax operating income, show the deductions for interest and other tax reconciling items, and show the calculation of current and deferred state and federal income tax expense. The response should also provide the amortization of investment tax credits attributable to distribution operations.
- f. Any other expenses that the Company believes that it would be appropriate to include in the distribution cost of service, with a brief explanation.
- g. Any expenses included in parts b-e that the Department has traditionally excluded from the distribution cost of service, with a brief explanation.
- h. Any items that the Company believes that it would be appropriate to credit to the distribution cost of service, with a brief explanation.

AG-2-9 Referring to the prior information request, for 2000 (or 1999, if 2000 is not yet available) are there any items of revenue or expense that the Company believes are not representative of the revenue that will be earned, or expense that will be incurred, prospectively? If the response is affirmative, please provide the following:

- a. Specific identification of each such item of revenue or expense.
- b. An explanation of why such item is not representative of prospective conditions.
- c. How each such item should be adjusted so that it is representative of prospective conditions.
- d. The dollar amount by which each such item should be adjusted.
- e. Workpapers, calculations, and documentation supporting each such adjustment.

AG-2-10 Please provide the capital structure, cost of long-term debt, cost of short-term debt, and cost of preferred stock attributable to distribution operations as of December 31, 1999 and December 31, 2000. The response should show how the relevant balances and capital ratios are developed from the Company's balance sheet as of those dates and should provide supporting calculations for the requested cost rates.

AG-2-11 Please provide the Seabrook Surcharge revenues for each of the years 1999 and 2000 and an explanation of the extent to which those revenues are included in the revenues discussed in the Company's response to Information Request AG- 2-8, part (a).

AG-2-12 Please provide the following information regarding the year 1999 and year 2000 wages and salaries included in the Company's electric distribution costs:

- (1) the total wages and salaries cost for each employee group (e.g. union, management, and non-union, non-management);
- (2) the wages and salaries capitalized by employee group;
- (3) the wages and salaries included in distribution operations and maintenance expenses by employee group;
- (4) the wages and salaries charged to other electric distribution operations by employee group.

AG-2-13 Please provide the following information regarding the year 1999 and year 2000 wages and salaries for Fitchburg Gas and Electric Company:

- (1) the total wages and salaries cost separately for the gas division and the electric division;
- (2) the wages and salaries expense separately for the gas division and the electric division;
- (3) the wages and salaries expense included in the administrative and general accounts separately for the gas division and the electric division; and
- (4) the wages and salaries expense charged to other Company businesses separately for the gas division and the electric division.

AG-2-14 Please provide the following information regarding the year 1999 and year 2000 wages and salaries for the Company's electric division attributed to each of the services it provides (e.g. distribution, transmission, standard offer, default, demand side management):

- (1) the total wages and salaries cost for each employee group (e.g. union, management, and non-union, non-management);
- (2) the wages and salaries capitalized by employee group; and
- (3) the wages and salaries included in operations and maintenance expenses by employee group.

Dated: January 10, 2001.